

## TULARE COUNTY COMPOST & BIOMASS, INC.

California Regional Water Quality  
Control Board - Central Valley Region  
11020 Sun Center Dr. #200  
Rancho Cordova, CA 95670-6114  
Attn: Bill Brattain

April 7, 2005

Comments on Draft General WDRs

Dear :

Tulare County Compost & Biomass is a small composting operation, as are many others in our area. After reading through this draft, it appears to us that there was absolutely no consideration for small composting operations such as ours. In order to comply to your draft's standards as listed on page 10, we'd be forced to spend several hundreds of thousands of dollars on all suggested standards other than the management practices. These costs would be handed down directly to the cities and municipalities that we serve. The costs to those entities would be so great that it would be beneficial, financially, to simply take the state-imposed fines and not meet their waste reduction quotas.

I understand the need to implement certain controls to prevent contamination of ground water by leachate substances. However, as is clearly demonstrated in our annual inspections by the Regional Water Board, and our monthly inspections by Lead Enforcement Agency for the State Waste Board, our greenwaste composting facility generates minor leachate, so minor, in fact, that the Water Board has never considered it an issue.

We ask that you please reconsider these standards as they apply to greenwaste composting facilities such as ours. Perhaps it would be beneficial to have a separate category for greenwaste composting facilities and not lump them into other waste facilities where leachate and contamination are of much greater concern. We hope that you will take this into consideration before you decide to implement these standards. Should you wish to further discuss this, please feel free to contact me at your convenience. Thank you for your time in this matter.

Sincerely,



John Jones

**ohn Jones**  
anager

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